

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Mooresville Regional Office
County: Rowan
NC Facility ID: 8000176
Inspector's Name: Karyn Kurek
Date of Last Inspection: 08/13/2019
Compliance Code: 3 / Compliance - inspection

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|--|---|--|--|------|------|-----------|--------------------|--|---|
| Facility Data Applicant (Facility's Name): Continental Structural Plastics - Salisbury Facility Address: Continental Structural Plastics - Salisbury 6701 Statesville Boulevard Salisbury, NC 28147 SIC: 3089 / Plastics Products, Nec NAICS: 326199 / All Other Plastics Product Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V | | | Permit Applicability (this application only) SIP: 02D .0503, 02D .0515, 02D .0516, 02D .0521, 02D .0524, 02D .1111, 02D .1806 NSPS: Subpart Dc NESHAP: Subpart PPPP, Subpart WWWW, Subpart DDDDD PSD: PSD Avoidance: NC Toxics: 112(r): Other: | | | | | | |
| Contact Data | | | Application Data Application Number: 8000176.19A Date Received: 06/11/2019 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 09076/T10 Existing Permit Issue Date: 05/19/2015 Existing Permit Expiration Date: 04/30/2020 | | | | | | |
| Facility Contact Eddie Fischer EHS Manager (704) 645-4657 6701 Statesville Boulevard Salisbury, NC 28147 | Authorized Contact Vinod Shah Director - Health, Safety & Env. Affairs (248) 823-5664 255 Rex Boulevard Auburn Hills, MI 48326 | Technical Contact Eddie Fischer EHS Manager (704) 645-4657 6701 Statesville Boulevard Salisbury, NC 28147 | | | | | | | |
| Total Actual emissions in TONS/YEAR: | | | | | | | | | |
| CY | SO2 | NOX | VOC | CO | PM10 | Total HAP | Largest HAP | | |
| 2018 | 0.0400 | 6.34 | 48.72 | 5.33 | 1.79 | 20.52 | 19.61 [Styrene] | | |
| 2017 | 0.0400 | 6.27 | 50.36 | 5.27 | 1.68 | 20.34 | 19.59 [Styrene] | | |
| 2016 | 0.0400 | 6.11 | 66.16 | 5.14 | 1.30 | 15.18 | 14.27 [Styrene] | | |
| 2015 | 0.0400 | 6.53 | 46.28 | 5.48 | 1.89 | 17.48 | 16.73 [Styrene] | | |
| 2014 | 0.0400 | 5.97 | 47.98 | 5.01 | 3.20 | 15.30 | 14.26 [Styrene] | | |
| <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> Review Engineer: Urva Patel Review Engineer's Signature: _____ Date: _____ </td> <td style="width: 50%; vertical-align: top;"> Comments / Recommendations: Issue 09076/T11 Permit Issue Date: _____ Permit Expiration Date: _____ </td> </tr> </table> | | | | | | | | Review Engineer: Urva Patel Review Engineer's Signature: _____ Date: _____ | Comments / Recommendations: Issue 09076/T11 Permit Issue Date: _____ Permit Expiration Date: _____ |
| Review Engineer: Urva Patel Review Engineer's Signature: _____ Date: _____ | Comments / Recommendations: Issue 09076/T11 Permit Issue Date: _____ Permit Expiration Date: _____ | | | | | | | | |

1. Purpose of Application:

Currently, Continental Structural Plastics – Salisbury holds Title V Permit No. 09076T10 with an expiration date of April 30, 2020. The Title V renewal permit application (**Application No. 8000176.19A**) was received on June 11, 2019, which was at least nine months prior to the expiration date of the Title V permit. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description:

Continental Structural Plastics (Formerly Magna Composites) manufactures plastic parts used for automotive components. Current permitted sources include: twenty one (21) thermosetting presses, seven (7) spray booths, a natural gas-fired curing oven, two (2) natural gas-fired boilers, an adhesive bonding operation, and a sanding operation controlled by a bagfilter. Continental Structural Plastics is a major source of hazardous air pollutant (HAP) emissions. The presses are subject to MACT Subpart WWW, while the coating operations are subject to MACT Subpart PPPP.

3. History / Background / Application Chronology:

Application Chronology

| | |
|------------------|---|
| May 19, 2015 | Permit 09076T10 issued as combined TV renewal, ownership change and minor modification for removal of air toxics conditions. |
| June 11, 2019 | Received Title V Renewal application (8000176.19A). |
| June 19, 2019 | Sent acknowledgement letter indicating that the application (8000176.19A) for permit renewal was complete. |
| January 6, 2020 | This permit application was transferred to Urva Patel for processing. |
| January 28, 2020 | Internal assistance - Technical add information request sent to Mr. Joseph Voelker for query regarding revision of MACT 5D, 4W and 4P. |
| March 2, 2020 | Technical add information request sent to applicant for confirmation for NOCS (MACT 5D), energy assessment reporting (MACT 5D), initial tune-up (MACT 5D), initial compliance confirmation (MACT PPPP), and NOC date (MACT PPPP). |
| March 9, 2020 | Applicant responded to add information request. |

4. Summary of Changes to the Existing Permit (Permit No. 09076T10):

| Page No. | Section | Description of Changes |
|--------------|--------------------------|--|
| Cover Letter | N/A | <ul style="list-style-type: none">Updated cover letter with application number, permit numbers, dates, fee class, PSD increment statement, and Director name. |
| Permit Cover | N/A | <ul style="list-style-type: none">Inserted new issuance and complete application date, application number, facility information. |
| 5 | 2.1 B.1.f | <ul style="list-style-type: none">Revised reporting condition as per current TVCOND69. |
| 6 | 2.1 B.3.c and e | <ul style="list-style-type: none">Revised monitoring and reporting condition as per current TVCOND69. |
| 6 | 2.1 C.1.f | <ul style="list-style-type: none">Revised reporting condition as per current TVCOND69. |
| 7 | 2.1 C.2.c and e | <ul style="list-style-type: none">Revised monitoring and reporting condition as per current TVCOND69. |
| 9 | Section 1, Table 2.1 D.5 | <ul style="list-style-type: none">Removal of the 02D .1109 – “Case-by-Case MACT” permit condition and all its reference as the permit sunset the applicability of this regulation with the applicability of the MACT 5D.Renumbered remaining permit conditions. |
| 9 | 2.1 D.5 | <ul style="list-style-type: none">Revised permit condition - MACT DDDDD. |

| Page No. | Section | Description of Changes |
|----------------------|----------------------|---|
| 25 | 2.2 B | <ul style="list-style-type: none"> Removal of 02D .0958 permit condition as it is not applicable to Rowan County. Revised all reference s due to removal of permit condition 02D .0958. |
| Cover and throughout | Cover and throughout | <ul style="list-style-type: none"> Updated regulation references from “2D” and “2Q” to “02D” and “02Q” to be consistence with regulation nomenclatures. |
| Permit | Section 3 | <ul style="list-style-type: none"> Updated General Conditions from version 3.6 to current shell version 5.3 |

5. Compliance Status:

DAQ has reviewed the compliance status of this facility. During the most recent inspection conducted on August 13, 2019, Karyn Barksdale of the Mooresville Regional Office indicated that the facility appeared to be in compliance with all applicable requirements. Additionally, a signed Title V Compliance Certification (Form E5) indicating that the facility was in compliance with all applicable requirements was submitted with Application No. 8000176.19A on June 11, 2019.

Five-year Compliance History:

- The facility was inspected on August 13, 2019 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on July 18, 2018 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on June 27, 2017 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on June 28, 2016 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on June 19, 2015 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on April 29, 2014 and appeared to be in compliance with all applicable air quality regulations.

6. New/Modified Equipment/Changes in Emissions:

This application is submitted as Title V – renewal. No changes requested with this permit application. Therefore, no changes in air emissions are expected.

7. Regulatory Review

Unless specifically noted, a detailed discussion of the following list of permit conditions is not included as applicability status has not changed. The facility is expected to be in continued compliance.

1. Applicable Regulatory Requirements:

- 15A NCAC 02D .0503: “Particulates from Fuel Burning Indirect Heat Exchangers”
- 15A NCAC 02D .0515: “Particulates from Miscellaneous Industrial Processes”
- 15A NCAC 02D .0516: “Sulfur Dioxide Emissions from Combustion Sources”
- 15A NCAC 02D .0521: “Control of Visible Emissions “
- 15A NCAC 02D .0524: “New Source Performance Standards” (40 CFR 60, Subpart Dc)
- 15A NCAC 02D .1111: “Maximum Achievable Control Technology” (40 CFR 63, Subpart PPPP)
- 15A NCAC 02D .1111: “Maximum Achievable Control Technology” (40 CFR 63, Subpart WWWW)
- 15A NCAC 02D .1111: “Maximum Achievable Control Technology” (40 CFR 63, Subpart DDDDD)
- 15A NCAC 02D .1806: “Control of Odorous Emissions” (*State-Enforceable Only*)

2. Changes per the Title V Permit Renewal:

- **Removal of 15A NCAC 02D .0958 “Work Practices for Sources of Volatile Organic Compounds”.**
On November 1, 2016, amendments to 15A NCAC 02D .0902 for VOC emissions were finalized to narrow applicability of the work practice standards in 15A NCAC 02D .0958 from statewide to the maintenance area

for the 1997 8-hour ozone standard. This change is being made primarily because the abundance of biogenic VOC emissions in North Carolina results in ozone formation being limited by the amount of available NOx emissions. Provisions of the Clean Air Act require VOC requirements previously implemented in an ozone nonattainment area prior to redesignation remain in place. However, facilities outside the maintenance area counties for the 1997 8-hour ozone standard would no longer be required to comply with the work practice standards in 15A NCAC 02D .0958.

8. NSPS, NESHAP/MACT, NSR/PSD, 112(r), CAM

NSPS

This facility is subject to New Source Performance Standards (NSPS), 40 CFR 60, Subpart Dc as noted above. This permit renewal does not change this status.

NESHAP/MACT

This facility is subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 for the Subparts noted below. This permit renewal does not affect this status.

- 40 CFR Part 63 Subpart PPPP for Surface Coating of Plastic Parts and Products – The spray booths are subject to this regulation. The current permit includes detailed Subpart PPPP language as it applies to new and existing sources at CSP.
- 40 CFR Part 63 Subpart WWWW for Reinforced Plastics Composite Production – The compression molding presses are subject to this regulation. The current permit includes detailed Subpart WWWW language as it applies to new and existing sources at CSP.
- 40 CFR Part 63 Subpart DDDDD for Industrial, Commercial, and Institutional Boilers and Process Heaters – The natural gas boilers at this facility are subject to this regulation. The current permit includes detailed Subpart DDDDD language as it applies to new and existing sources at CSP.
- Note. 15A NCAC 2D .1109 – CAA § 112(j); Case-by-Case MACT for Boilers & Process Heaters – The two natural gas-fired boilers (**ID Nos. B-1 and B-2**) were subject to this regulation under permit no. 09076T10. The permit sunset the applicability of this regulation with the applicability of the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD on May 19, 2019. Therefore, the requirements are being removed as they no longer apply.

NSR/PSD

The facility is located in Rowan County which is currently designated as attainment or unclassified for all PSD regulated pollutants. Cumberland County is triggered for PM₁₀, SO₂, and NO_x emissions with respect to minor source baseline dates. However, this permit renewal does not affect these triggered pollutants.

112(r)

This facility is NOT subject to the requirements of the Chemical Accident Release Prevention Program, Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above applicability thresholds. But the facility is subject to the General Duty requirements of 112(r).

Compliance Assurance Monitoring (CAM)

The facility is NOT subject to CAM. There are no new control devices proposed in this permit renewal. Therefore, this permit renewal does not change this status.

9. Facility-Wide Air Toxics:

The facility is not currently subject to the NC Air Toxics Program. This permit renewal application does not trigger an air toxics review.

10. Facility Emission Review:

Actual emissions for 2014 through 2018 are reported in the header of this permit review.

12. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. South Carolina and Mecklenburg County-local program are affected state(s)/local program(s) within 50 miles of the facility.

13. Other Regulatory Considerations:

- A Permit Application fee is NOT required for Permit Application No. 8000176.19A.
- A P.E. Seal is NOT required for Permit Application No. 8000176.19A.
- A 30-day public notice and 45-day EPA review is required for Permit Application No. 8000176.19A as noted above.
- A Zoning Determination is NOT required for Permit Application No. 8000176.19A.

14. Recommendations/Conclusion:

TBD